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**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**  
**FRESNO DIVISION**

JOEL DE HARO GONZALEZ,

Plaintiff,

vs.

MARTIN O'MALLEY,  
Commissioner of Social Security,

Defendant.

Case No.: 1:24-cv-00222-KES-CDB

STIPULATION AND [PROPOSED] ORDER  
FOR AN EXTENSION OF TIME

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's Complaint be extended thirty (30) days from April 22, 2024, up to and including May 22, 2024. This is the Defendant's first request for an extension.

Defendant makes this request in good faith and for good cause, with no intent to delay proceedings unduly. The certified administrative record in this case is not yet available. Although Defendant is requesting an extension to May 22, 2024, counsel will aim to file the certified administrative record before that date if it is available before then.

1 The parties further stipulate that the Court's Scheduling Order shall be modified  
2 accordingly.

3  
4 Dated: April 18, 2024

Respectfully submitted,

5 /s/ Jonathan Peña\*

6 (\*as authorized via e-mail on Apr. 18, 2024)

JONATHAN PEÑA

7 Attorney for Plaintiff

8 PHILLIP A. TALBERT

9 United States Attorney

10 MATHEW W. PILE

Associate General Counsel

11 Social Security Administration

12 By: /s/ Christopher Vieira

13 CHRISTOPHER VIEIRA

Special Assistant U.S. Attorney

14 Attorneys for Defendant

15  
16 **ORDER**

17 Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an  
18 extension, up to and including May 22, 2024, to respond to Plaintiff's Complaint.

19  
20 DATED: April 19, 2024



21 HON. CHRISTOPHER D. BAKER

22 UNITED STATES MAGISTRATE JUDGE